

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) QUILL INK BOOKS LIMITED, a
foreign corporation,

Plaintiff,

v.

(1) ABCD GRAPHICS AND DESIGN,
INC., D/B/A BLUSHING BOOKS
PUBLISHING, a foreign corporation, *et al.*,

Defendants.

Case No.: CIV-18-920-G

DEFENDANT’S OFFER OF JUDGMENT

Defendant, ABCD Graphics and Design, Inc. d/b/a Blushing Books Publishing (“Defendant”), pursuant to Fed. R. Civ. P. 68, extends the following offer of judgment to Plaintiff, Quill Ink Books Limited (“Plaintiff”) and stipulates that Zoey Ellis’s Myth of Omega series does not plagiarize Addison Cain’s Alpha’s Claim series, and the take-down notices transmitted pursuant to the Digital Millennium Copyright Act are invalid.

Defendant hereby waives the 14-day requirement of Rule 68 and consents to Magistrate Judge Suzanne Mitchell entering final disposition of this case.

Dated this 9th day of September, 2019.

s/ Becky Briggs

Becky Briggs, Esq.

THE LAW OFFICE OF BECKY BRIGGS, LLC

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/ Becky Briggs

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Defendants.

PLAINTIFF’S ACCEPTANCE OF DEFENDANT’S OFFER OF JUDGMENT

Plaintiff, Quill Ink Books Limited (“Plaintiff”), hereby accepts the offer of judgment proffered by Defendant, ABCD Graphics and Design, Inc. d/b/a Blushing Books Publishing (“Defendant”) on September 9, 2019.

Plaintiff hereby waives the 14-day requirement of Rule 68 and consents to Magistrate Judge Suzanne Mitchell entering final disposition of this case.

Dated this 9th day of September, 2019.

s/ Gideon A Lincecum

Gideon A. Lincecum, OBA No. 19674

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

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s/ Gideon A. Lincecum

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JUDGMENT

The Court enters judgment pursuant to the accepted offer of judgment under Fed. R. Civ. P. 68. *See* Docs. 89-90.

ENTERED on this 9th day of September, 2019.



SUZANNE MITCHELL
UNITED STATES MAGISTRATE JUDGE